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16 **Attorneys for Defendant**
17 ***LAURI VALJAKKA***

18 **UNITED STATES DISTRICT COURT**
19 **NORTHERN DISTRICT OF CALIFORNIA**
20 **OAKLAND DIVISION**

21 LAURI VALJAKKA,
22 Plaintiff,
23 v.
24 NETFLIX, INC.,
25 Defendant.

Case No. 4:22-cv-01490-JST

**DECLARATION OF LAURI
VALJAKKA IN SUPPORT OF
MOTION TO DISQUALIFY**

Date: February 15, 2024

Time: 2:00 p.m.

Judge: Hon. Jon S. Tigar

Crtrm: 6 – 2nd Floor

26
27 I, Lauri Valjakka, declare as follows:

28 1. My name is Lauri Valjakka. I am over 18 years of age, and have personal

1 knowledge of the facts set forth in this declaration. I make this declaration in support
2 of the Motion to disqualify Whitestone Law. I am the plaintiff in the above-captioned
3 matter and have personal knowledge of the statements below and can testify as to the
4 truth of each.

5 2. I contacted Eric Morehouse in March to April of 2021 about pursuing
6 companies I believed were infringing my U.S. Pat. No. 8,495,167 (“the ‘167 patent”).
7 He introduced me to his company, AiPi, LLC.

8 3. I worked primarily with Eric Morehouse (“Morehouse”) and Erik Lund
9 (“Lund”) at AiPi. Morehouse and Lund, through AiPi, provided me technical and
10 legal services. I considered both Morehouse and Lund as my lawyers.

11 4. In providing legal services, Morehouse and Lund helped me identify
12 alleged infringers, including Netflix, draft claim charts and draft complaints against
13 the alleged infringers.

14 5. The complaints were filed by Ramey LLP and another firm, but AiPi,
15 through Morehouse and Lund, continued to provide me legal services and I regard
16 both as my lawyers. AiPi has been engaged in all legal decision making from the
17 filing of the lawsuit to the present.

18 6. At some point in the summer of 2023, Morehouse and Lund introduced
19 me to Whitestone Law, a firm Morehouse had co-founded. Whitestone’s lawyers
20 were the same as the ones with AiPi, including Morehouse, Lund, Ken Sheets, and
21 others. In fact, the only new lawyer I was aware of at Whitestone that had not been at
22 AiPi was Joseph Zito.

23 7. Whitestone and its lawyers immediately began assisting on all aspects of
24 the case. In fact, Sheets and Zito defended me in an October 12, 2023 deposition.

25 8. Whitestone Law and its attorneys gained confidential information
26 regarding my case against Netflix through their representation. In particular,
27 Whitestone Law and AiPi are both very familiar with the legal services performed for
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1 me by Morehouse, Lund, Sheets, and the attorneys with Ramey LLP from the
2 inception of the case, including representing me at a December 12, 2023 deposition
3 concerning the alleged CUVTA violation for which AiPi is being joined.

4 9. After I signed a litigation funding agreement with AiPi in 2021, I
5 expected litigation payments for case expenses and fees for my attorneys to be paid
6 by AiPi. I only signed the agreement because AiPi said they had adequate funding to
7 take my case through trial and any necessary appeals. However, while a few
8 payments were made, AiPi was always behind on payments and never appeared to
9 have any money. From 2022 to the present I would call Morehouse routinely to
10 request payment and to inform him that his late payment was hurting my case.
11 Morehouse always said he had the money and would make the payments.

12 10. AiPi ceased making payments on my case at some point in the summer
13 of 2023.

14 11. In the fall of 2023, I had my lawyers at Ramey LLP and Onni Hietalahti
15 inform AiPi on multiple occasions that the nonpayment by AiPi was hurting my case.

16 12. In late November, early December of 2023, I received a letter from AiPi
17 saying they would no longer provide resources for my case.

18 13. I am very concerned that my lawyers at Whitestone Law, previously with
19 AiPi, are now representing AiPi. I intend to pursue a claim for fraudulent inducement
20 against AiPi of the AiPi funding agreement, among other causes of action, as AiPi
21 never had the resources to fund my case. As such, I see my interests adverse to those
22 of AiPi.

23 14. My concern is increased because Netflix has moved to join AiPi in the
24 litigation as a defendant. I do not see my interests in alignment with AiPi. AiPi has
25 my confidential information and I am afraid they will use that to harm my case, as
26 they did with the CUVTA discovery responses. I am directly opposed to AiPi.

1 I declare under penalty of perjury and the laws of the United States of America that
2 the foregoing is true and correct.

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5 Dated: December 12, 2023

6 /s/ 
7 Lauri Valjakka
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